

Robert W. Krueger

President / Chief Executive Officer

ComSouth

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February 26, 2007

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, NW, Suite A325
Washington, DC 20554

**Re: EB Docket No. 06-36
COMSOUTH TELECOMMUNICATIONS, INC.**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice, DA 08-171 (Jan. 29, 2008), attached please find ComSouth Telecommunications, Inc.'s Certification of CPNI Filing and the accompanying descriptive statement as required by Section 64.2009 of the Commission's Rules.

The undersigned can be contacted should you have any questions or require additional information.

Sincerely,



Robert W. Krueger
President & CEO

RWK/aj

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Annual 64.2009(e) CPNI Certification for 2008

Date Filed: February 25, 2008

Name of company covered by this certification: ComSouth Telecommunications, Inc.

Form 499 Filer ID: 801111

Name of signatory: Robert W. Krueger

Title of signatory: President and CEO

I, Robert W. Krueger, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed Robert W. Krueger

CPNI Compliance Procedures ComSouth Telecommunications, Inc.

We have made several major changes to comply with the recent changes to customers CPNI information. Listed below are the changes that have been made:

- Changed customer billing software to require customer created PIN for any access to customers account.
- Changed customer billing software to require any additional authorized contacts to be listed on customers account by the customer whose name is listed on the account.
- Changed online account access website to require customer to setup CPNI password with CSR first before being able to access account online.
- Customers must be authorized on account and know current password to be able to make any changes to account, including payments.
- Customer call detail request over the phone must be authenticated using one of the following 3 methods. Customer provides pre-established password, CSR sends information to address on file or CSR calls customer back at telephone number on file.
- ComSouth sent customers and Opt-Out letter allowing the customer to prohibit ComSouth from sharing the customers CPNI information with others.
- ComSouth has implemented in customer billing software the requirement to send a customer notification of any account changes that take place.
- ComSouth has implemented in the customer billing software the ability to notify the customer when and if any unauthorized CPNI breach has occurred, also notify the necessary authorities (law enforcement, USSS and FBI).
- Necessary ComSouth employees have been trained on the appropriate use of customer CPNI information, and have been notified of the disciplinary actions associated with any misuse.
- ComSouth has in place procedures to document all instances where CPNI was disclosed to unauthorized persons, and keep these on record
- All of these changes were in place effective December 8, 2007.